

September 28, 2022

Tony Doan
State Building Code Council Chair
1500 Jefferson Street SE
PO Box 21499
Olympia, WA 98504

Doug,

On behalf of the Washington Association of Building Officials (WABO) and the Washington State Association of Fire Marshals (WSAFM), I am submitting a public comment relating to the SBCC recommended code changes in the CR102 document dated August 23, 2022, for the Washington Wildland Urban Interface Code (WA-WUIC).

Review of the CR102 outlining the proposed changes, there remained necessary revisions to items that needed additional peer review. Those identified areas for additional review were discussed during an SBCC meeting and were understood they would be provided as a public comment to complete the proposed revisions to the WA-WUIC.

This public comment provides the necessary information that will allow the WA-WUIC user to effectively navigate the process of application and enforcement of this Code.

Additionally, we request that the proposed changes, log number 21-GP2-059, submitted for Section 302.2 of the WUIC, be withdrawn from consideration.

Thank you for the work the Building Code Council does and the opportunity to present our ideas for modifications.

Sincerely,

Micah Chappell

Washington Association of Building Officials Technical Code Development and Washington State Association of Fire Marshals Wildland Urban Interface Workgroup Chair.

State Building Code Council

Public Comment

Wildland Urban Interface Code

Amend sections to read as follows:

SECTION 202 DEFINITIONS

WASHINGTON WILDLAND URBAN INTERFACE MAP (WA-WUI). The Washington department of natural resources map designating urban areas, wildland-urban interface, wildland-urban intermix, wildlands, and long-term non-buildable areas, designated as the *Washington Wildland Urban Interface as mapped for 2019 by the Washington State Department of Natural Resources—Wildfire and Forest Health Divisions under consultation from the USFS Rocky Mountain Research Station.*

HIGH-DENSITY VEGETATED AREA. An area defined by a square determined in accordance with Section 302.3.1, with 75% or more vegetation.

CHAPTER 3 WILDLAND URBAN INTERFACE AREAS

SECTION 301 GENERAL

~~**301.1 Scope.** The provisions of this chapter provide methodology to establish and record wildland-urban interface areas based on the findings of fact.~~

Commented [BS(1): Currently not shown in WAC as a proposed amendment.

~~**301.2 Objective.** The objective of this chapter is to provide simple baseline criteria for determining wildland-urban interface areas.~~

Commented [BS(2): Currently not shown in WAC as a proposed amendment.

301.1 Scope. Wildland urban interface areas shall be determined using the Washington Wildland Urban Interface Map (WA-WUI). WA-WUI designations are permitted to be modified, upon approval of a finding of fact in accordance with Section 302.

USER NOTE: The WA-WUI map is available at <https://data-wadnr.opendata.arcgis.com/apps/wildland-urban-interface-viewing-app/explore>.

301.2 Construction in wildland-urban interface or intermix areas. Where a structure is proposed to be constructed in an area designated by the WA-WUI map as wildland-urban interface or intermix, the construction shall comply with the provisions of this code.

301.3 Construction in wildlands areas. Where a structure is proposed to be constructed in an area designated by the WA-WUI map as wildlands, the applicable wildland urban interface area designation shall be based on a finding of fact in accordance with Section 302.

SECTION 302

WILDLAND-URBAN INTERFACE AREA DESIGNATIONS

~~**302.1 Declaration.** The legislative body shall declare the wildland urban interface areas within the jurisdiction. The wildland urban interface areas shall be based on the findings of fact. The wildland urban interface area boundary shall correspond to natural or man-made features.~~

~~**302.2 Mapping.** The wildland urban interface areas shall be recorded on maps available for inspection by the public.~~

~~**302.3 Review of wildland urban interface areas.** The code official shall reevaluate and recommend modification to the wildland urban interface areas in accordance with Section 302.1 on a 2-year basis or more frequently as deemed necessary by the legislative body.~~

302.1 General. Wildland urban interface area designations are permitted to be established in accordance with this section.

302.2 Finding of fact. The applicable wildland urban interface designation shall be based on a finding of fact. The finding of fact shall comply with the provisions of Appendix E, or is permitted to be based on the worksheet and procedures in Section 302.3.

302.3 Simplified wildland urban interface designation worksheet. The wildland urban interface designation is permitted to be established using the procedure outlined in Figure 302(1), using the worksheet in Figure 302(2).

302.3.1 Area to be evaluated. For the purposes of establishing structure and vegetation densities, the area covered by a square of 1320 feet on a side (40 acres) shall be evaluated. The square area shall be located such that the site under consideration is in its center, except where the square would overlap a water body shown on the WA-WUI map with a surface area greater than 200,000 square feet, the location shall be adjusted such that no part of the square overlaps the water body.

302.3.2 Structure density category. The structure density category shall be determined by counting the number of structures within the area to be evaluated per Section 302.3.1. The structure density category shall be determined as follows:

UNINHABITED: 0 structures

VERY LOW: 1 structure

LOW: 2 to 8 structures

MEDIUM: 9 to 120 structures

HIGH: more than 120 structures

302.3.3 Vegetation density category. Vegetation coverage within the area to be evaluated per Section 302.3.1 shall be determined in accordance with Chapter 9. Vegetation density shall be determined by dividing the vegetation coverage by 1,742,400 square feet (40 acres). Where the vegetation density is less than 50%, the vegetation density category for the site shall be Non-Vegetated. Where the vegetation density is 50% or more, the vegetation density category for the site shall be Vegetated.

302.3.4 Proximity category. The distance from the site being evaluated to a high-density vegetated area shall be measured from the closest edge of the site boundary to the closest edge of the nearest

high-density vegetated area. Where the distance is less than 1.5 miles, the proximity category shall be Near. Where the distance is 1.5 miles or more, the proximity category shall be Distant.

302.3.5 WUIC applicability. The WUIC shall apply and the site shall be designated as Intermix or Interface in accordance with Section 302.3.6 under either of the following conditions:

1. The structure density category is Very Low to High, and the vegetation density category is Vegetated.
2. The structure density category is Very Low to High, and the proximity category is Near.

The WUIC shall not apply under either of the following conditions:

1. The structure density category is Uninhabited, and the site is not located within an area designated as Intermix or Interface on the WA-WUI map.
2. The structure density category is Uninhabited to High, the vegetation density category is Non-Vegetated, and the proximity category is Distant.

302.3.6 Wildland urban interface area designation. Where required by Section 302.3.5, the site shall be designated as Intermix or Interface in accordance with Section 302.3.6.1 or 302.3.6.2.

302.3.6.1 Intermix designation. The site shall be designated as Intermix where the structure density category is Very Low to High, and the vegetation density category is Vegetated.

302.3.6.2 Interface designation. The site shall be designated as Interface where the structure density category is Very Low to High, and the proximity category is Near.

For the area to be evaluated in Section 302.3.1:

1. Determine structure density category (uninhabited, very low, low, medium, or high)
2. Determine vegetation density category (non-vegetated or vegetated)
3. Determine proximity category (near or distant).
4. Based on structure density, vegetation density, and proximity categories, determine if compliance with this code is required (WUIC applies, WUIC does not apply).
5. Where compliance with this code is required, determine wildland urban interface area designation (intermix or interface).

Figure 302(1). Outline of simplified procedure for determining wildland interface designation

1. Determine structure density category in accordance with Section 302.3.2. Numbers in table are the number of structures within the area determined by Section 302.3.1.

<u>UNINHABITED</u>	<u>VERY LOW</u>	<u>LOW</u>	<u>MEDIUM</u>	<u>HIGH</u>
<u>0</u>	<u>1</u>	<u>2 to 8</u>	<u>9 to 120</u>	<u>more than 120</u>

2. Determine vegetation density category within the area determined by Section 302.3.1.

<u>NON-VEGETATED</u>	<u>VEGETATED</u>
<u>Less than 50% vegetated</u>	<u>50% or more vegetated</u>

3. Determine proximity category to the nearest high-density vegetated area.

<u>NEAR</u>	<u>DISTANT</u>
<u>Less than 1.5 mi (2.414 km)</u>	<u>1.5 mi (2.414 km) or more</u>

4. Use structure density, vegetation density, and proximity categories from above to determine if WUIC applies.

<u>WUIC Applies</u>	<u>WUIC Does Not Apply</u>
<ul style="list-style-type: none"> • <u>Structure density category is Very low to High, and</u> • <u>Vegetation density category is Vegetated</u> 	<ul style="list-style-type: none"> • <u>Structure density category is Uninhabited, and</u> • <u>The site is not located within an area designated as Intermix or Interface on the WA-WUI map</u>
<ul style="list-style-type: none"> • <u>Structure density category is Very Low to High, and</u> • <u>Proximity category is Near</u> 	<ul style="list-style-type: none"> • <u>Structure density category is Uninhabited to High, and</u> • <u>Vegetation density category is Non-Vegetated, and</u> • <u>Proximity category is Distant</u>

5. Where WUIC applies, the site shall be designated as Intermix or Interface as follows:

<u>INTERMIX</u>	<u>INTERFACE</u>
<ul style="list-style-type: none"> • <u>Structure density category is Very Low to High, and</u> • <u>Vegetation density category is Vegetated</u> 	<ul style="list-style-type: none"> • <u>Structure density category is Very Low to High, and</u> • <u>Proximity category is Near</u>

Figure 302(2). Worksheet for simplified procedure for determining wildland interface designation